

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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JUL 26 1999

In the Matter of

Truth-in-Billing
and
Billing Format

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

CC Docket No. 98-170

**PETITION FOR RECONSIDERATION
OF SBC COMMUNICATIONS INC.**

I. Introduction

SBC Communications Inc.¹ (SBC) respectfully requests clarification or reconsideration of the requirement to separate charges by service provider, if needed, and reconsideration of the implementation schedule for two other requirements of the *Truth-in-Billing Order*.² The request for reconsideration of the implementation schedule is made on behalf of certain subsidiaries of SBC that need additional time to bring their billing systems into compliance with the requirements of the *Truth-in-Billing Order*. There is only one other aspect of the Truth-in-Billing requirements which SBC companies believe cannot be implemented on any reasonable schedule or at any reasonable cost. That issue is the "highlight new service provider" issue that is the subject of the United States Telephone Association's Petition for Reconsideration (USTA Petition). USTA has proposed a reasonable alternative and SBC strongly supports the

¹ SBC Communications Inc. is the parent company of various subsidiaries, including wireline telecommunications carriers. These subsidiaries include Southwestern Bell Telephone Company (SWBT), Pacific Bell, Nevada Bell, and The Southern New England Telephone Company (SNET). The abbreviation "SBC" shall be used herein to include each of these subsidiaries as appropriate in the context.

² *In the Matter of Truth-in-Billing and Billing Format*, CC Docket No. 98-170, First Report and Order and Further Notice of Proposed Rulemaking, FCC 99-72, Released May 11, 1999 (*Truth-in-Billing Order* or *Order*).

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A B C D E
SBC Communications Inc
July 26, 1999

USTA Petition. SBC is here raising only two additional issues. First, SBC seeks clarification, or in the alternative, reconsideration of the requirement for separating charges by service provider, if needed. Second, SBC seeks reconsideration of the schedule for implementation of the requirement to identify each service provider for Southern New England Telephone Company (SNET) and the requirement to more clearly distinguish between "deniable" and "non-deniable" charges for Southwestern Bell Telephone Company, Pacific Bell and Nevada Bell.

II. Separating Charges by Service Provider

Although the Commission clearly indicates its intent that the Truth-In-Billing requirements not interfere with the ability to offer a package of services at a single price in Paragraph 32 of the *Truth-in-Billing Order*, the requirement that charges must be separated by service provider could be read in such manner as to constitute a serious impediment to the offering of such packages. In many instances, the package of services that may be offered and billed ("provided") by a single entity may be technically provisioned by multiple legal entities, some of whom may hold licenses for the provision of their specific segment of the service. For example, many of the large telecommunications companies are now beginning to advertise a "one bill" concept where a customer could get a single bill for their cable TV service, long distance service, internet service and possibly other services. Some of those services, such as cable TV service, may require a FCC license and a franchise from the local municipal authority. Only entities holding such licenses and/or franchises could legally deploy the facilities to provision such services. However, to the extent that those services become part of a package of services that is marketed to customers by a single provider, that single provider is, so far as the customer is concerned, the service provider for that package. Customers generally do not want or need to know the legal names of license holders or the corporate structure of the company from whom they purchase telecommunications

and related services. They only want a clear identification of the entity that is taking responsibility for the sale and provision of the service and a clear and simple way to get in touch with that "service provider," if any questions or problems arise about the service.

Thus, for example, if a customer purchases local telephone service, local toll and voice messaging service from Southwestern Bell Telephone Company, that customer does not know or care that one or more of those services may be provided by an affiliate of SWBT, so long as there is a single inquiry contact number that the customer can call with any questions or problems. Display of the voice mail charge within the same segment of the bill where the local telephone service charges appear makes sense to the customer because, so far as the customer is concerned, the voice mail service has been purchased from SWBT, the same service provider from whom the local telephone service was purchased. Any interpretation of the Truth-in-Billing requirements that would require SWBT to display the voice mail charge separately, showing the name of the SWBT affiliate that actually provides the voice mail service as the "service provider" for that service, would only confuse and annoy the customer.

Of course, the requirement that the bill must include a single toll-free number on the bill that the customer can call to dispute any charge related to the package of services would still apply. Further, that toll-free number would have to place the customer in contact with someone that possesses sufficient information to answer questions concerning the customer's account and that is fully authorized to resolve consumer complaints on the carrier's behalf. Clear identification of the name and inquiry contact number of the service provider with sales and inquiry contact responsibility for the service package should provide customers with sufficient information. If, for some reason, a customer does want to know the specific legal name of the corporate entity that is actually provisioning some aspect of that package of services, that information can easily be provided in response to the customer's inquiry.

For all of the reasons set forth above, SBC seeks reconsideration of the requirement that charges must be separated by service provider if (1) the intent of that requirement is that charges for each element of the package of services must be broken out and displayed separately by service provider for each segment, and/or (2) the intent is that services that are actually provisioned by affiliates of the entity that has marketing and inquiry contact responsibility for the service must be displayed separately. If the requirement to separate charges by service provider does not require separation of charges provided by separate affiliated entities or entities providing a package of services under a marketing agreement, then no reconsideration of this requirement is requested by SBC.

III. Request for Reconsideration of Schedule for Implementation

SBC also seeks reconsideration of the schedule for implementation of specific provisions of the *Truth-in-Billing Order*. SBC is seeking reconsideration of the implementation only for the minimum time necessary for specific SBC local exchange companies to bring their billing systems into compliance with the requirements of the *Truth-in-Billing Order*, as more fully described below.

A. Southern New England Telephone Company

As SBC stated in its Petition for Waiver, SNET currently has a billing project in progress that will enable SNET to list the carriers for casually dialed calls on the bill as the service provider for those calls. However, that billing project will not be completed until October 2, 1999, and until that project is completed, SNET has no way to identify the actual service provider when the charges are submitted through a billing aggregator and the aggregator doesn't identify the underlying carrier. Thus, until the current billing project is completed, SNET will not be able to fully comply with the requirement to provide the name of the service provider associated with each charge, as required by §64.207 of the Truth-in-Billing rules.

As shown by the affidavit of Paul F. DeFalco, attached as Attachment A, SNET actually began activities on its Sub-entity Billing Project on May 18, 1999, in an effort to further clarify its customer bills. According to the original *High Level Order of Magnitude* estimate of the work effort required for the Sub-entity Billing project, an estimated 1140 hours of work across six application areas was required. However, that estimate was revised after further definition of the billing requirements and specifications for the SNET Information Technology systems. It was then determined that the earliest possible cut-over date for that billing product would be September 1, 1999, but that date was later revised to October 1, 1999, because of open issues, all as reflected in Attachment A.

The SNET sub-entity billing project is now on target for completion by October 1, 1999. SNET can reasonably expect that the billing product will function as intended, if the original schedule is completed as planned. However, as Mr. DeFalco explains in his affidavit (Attachment A), any requirement to expedite the project to allow completion of the sub-entity billing project by September 6, 1999, would jeopardize the quality of the resulting billing project. For that reason, SBC respectfully requests reconsideration of the implementation schedule for the requirement to identify the name of the service provider associated with each charge³ as it applies to SNET and requests that, on reconsideration, the Commission grant SNET an extension of just one month for compliance with that requirement. The sole purpose of the requested one month extension of the implementation schedule is to allow SNET to complete its billing project in an orderly fashion in order to bring its billing system into full compliance with the Truth-in-Billing requirements.

³ §64.2001(c)(1) of the Truth-in-Billing requirements.

B. Southwestern Bell Telephone Company, Pacific Bell and Nevada Bell

SBC also seeks reconsideration of the schedule for implementation of the requirement to more clearly differentiate between what are commonly referred to as "deniable" and "non-deniable" charges.⁴ As stated in SBC's Petition for Waiver, SNET is the only SBC Company currently able to meet the new requirements for clearer differentiation between deniable and non-deniable charges on its bill today. SBC is not here requesting reconsideration of the requirement, only that the required implementation date for this requirement be extended by approximately seven months for SWBT, Pacific Bell and Nevada Bell. Such extension of time will allow those companies only the minimum amount of time necessary to do the work to enable their billing systems to more clearly designate deniable charges in the same manner as SNET.

Attachment C is the Affidavit of Dan Roper, detailing the reasons why SWBT needs an extension of the implementation schedule through March 1999 to complete the necessary billing system revisions to allow SWBT to comply with the "deniable/non-deniable" requirement. Attachment D is the similar Affidavit of Shelley Skee explaining the reasons that the same timeframe will be required to make the same type of changes to the billing system serving Pacific Bell and Nevada Bell. The billing system revisions described in these affidavits will allow SWBT, Pacific Bell and Nevada Bell to more clearly differentiate between "deniable" and "non-deniable" charges on the customer bill by designating the "deniable" charges in the same manner that SNET does today.

As explained by Mr. Roper and Ms. Skee, the very earliest possible date by which the billing system revisions can be completed is March 1999, if the process is expedited and proceeds according to schedule. Even then, this is a very aggressive schedule for a

⁴ Attached as Attachment B is a SNET bill (with all details that would allow identification of the customer omitted) which is here offered as an example of the manner in which SNET currently distinguishes between "deniable" and "non-deniable" charges. Attachment B also serves as an example of the manner in which SWBT, Pacific Bell and Nevada Bell plan to differentiate between "deniable" and "non-deniable" charges.

billing project of this magnitude. In order to more clearly distinguish between deniable/non-deniable charges on a customer's bill, most of the mainline billing programs and multiple customer information databases will be impacted. Virtually every dollar billed to a customer must be classified, bucketed and displayed properly so that it is clear to the customer what charges are required to be paid in order to avoid the disconnection of their local service. Thus, as the affiants point out, a typical timeline for a major billing project, such as this one, would be nine to twelve months from inception to implementation. The SBC companies are committing to use their best efforts to achieve a March 1999 implementation date in order to bring their billing systems into compliance with the requirements of the *Truth-in-Billing Order* requirements at the earliest possible date.

One factor that impacts the timeframes within which this work can be done, however, is the critical nature of SBC's efforts to achieve Y2K compliance on schedule. A substantial amount of time and financial resources have been dedicated to this project to insure against any disruption in customer service on January 1, 2000. SBC companies have issued a software freeze during the November 1, 1999 to March 1, 2000 timeframe to minimize the risk to information systems during this critical timeframe. An exception is being made for the deniable/non-deniable project in order to try to achieve the March 2000 implementation date. However, in the event of a conflict with the Y2K activities that could cause customer service outages, the Y2K efforts should have to take precedence over the timely completion of the "deniable/non-deniable" billing project.

The critical steps necessary to the successful implementation of the deniable/non-deniable project for SWBT, Pacific Bell and Nevada Bell have been identified in Attachments C and D. Those steps are as follows:

- Documentation of the requirements of the project. This includes a determination of what needs to be done and how to do it, as well as a determination of how the designation is to appear on the bill.
- Identification of all impacted programs and analysis of the changes required by each program.
- System design to coordinate all of the impacted programs.
- Actual programming work to code necessary changes.
- Thorough testing of all changes in simulated environments and in parallel to the live environment.

As stated by the affiants, an estimate has been developed to determine the scope and time required to complete this project. More than 1,000 workdays are estimated by all disciplines. Some of this time would be groups working simultaneously to address their individual areas. Teams are already in the process of determining the billing changes that will be required for this project in order to bring the billing systems serving SWBT, Pacific Bell and Nevada Bell into full compliance with the Truth-in-Billing requirements by March 2000.

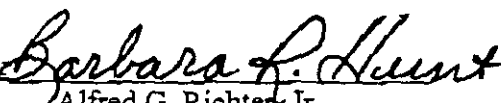
The time period proposed is the absolute minimum amount of time required to properly program and thoroughly test these changes. Implementation on a more aggressive schedule would jeopardize the results, as attested by both Ms. Skee and Mr. Roper. The SBC local exchange companies are endeavoring to implement the necessary changes to bring their billing systems into full compliance with the *Truth-in-Billing Order* in the shortest amount of time possible. For all of the reasons set forth above, SBC respectfully requests that the Commission reconsider the implementation schedule for the "deniable-non/deniable" requirement and extend the date of compliance with that requirement for SWBT, Pacific Bell and Nevada Bell to the end of March 2000.

IV. Conclusion

For all of the reasons set forth above, SBC respectfully urges the Commission to respond favorably to this Petition for Reconsideration. To the extent that the Commission intends that the requirement to separate charges by service provider would require separation of charges billed by different subsidiaries of the same parent corporation or the disaggregation of the single price for a package of services, SBC seeks reconsideration of that requirement. Any such requirement would have exactly the same effect on the ability to package as would the rejected requirement that charges be separated by type of service. Just as the Commission rejected the "separation by type of service" requirement because of the adverse effect such requirement would have on bundling or packaging, so should the Commission reject any interpretation of the "separate by service provider" requirement that would have the same effect. Finally, SBC respectfully urges the Commission to reconsider the implementation schedule and allow a one-month extension for SNET to comply with the "identify service providers" requirement and approximately a seven-month extension for SWBT, Pacific Bell and Nevada Bell on the "deniable/non-deniable" issue.

Respectfully Submitted,

SBC COMMUNICATIONS INC.

By 
Alfred G. Richter, Jr.
Roger K. Toppins
Barbara R. Hunt
One Bell Plaza, Room 3026
Dallas, Texas 75202
214-464-5170

Attorneys for SBC Communications Inc.
and its Subsidiaries

July 26, 1999

Certificate of Service

I, Mary Ann Morris, hereby certify that the foregoing "Petition For Reconsideration of SBC Communications Inc." in CC Docket No. 98-170 has been served on July 26, 1999 to the Parties of Record.


Mary Ann Morris

July 26, 1999

SBC Communications Inc
July 26, 1999

AFFIDAVIT OF PAUL F. DEFALCO

State of Connecticut

County of New Haven

BEFORE ME, the undersigned authority, on this day personally appeared Paul F. DeFalco who, after having been by me duly sworn, on oath deposes and says that:

1. My name is Paul F. DeFalco and I have been an employee of Southern New England Telephone Company for the past thirty years. I am over the age of eighteen and am not otherwise prohibited by law from making this affidavit. My title is Account Manager and I am responsible for the coordination and prioritization for Information Technology (IT) billing functional areas. All matters recited herein are true and correct to the best of my knowledge.
2. SNET began activities on the Sub-entity Billing Project on May 18, 1999 with efforts to define the scope of the project across Information Technology systems.
3. On June 3, 1999, Information Technology provided a *High Level Order of Magnitude* estimate of the work effort that would be required to complete system changes to support the Sub-entity Billing product. This order of magnitude included 1140 hours of work across six application areas with an estimated elapsed time of two months required for completion.
4. On June 8, 1999, further discussions were held to further define billing requirements and specifications for Information Technology systems. During those discussions based on the information at that time the earliest possible cut-over date could be September 1.
5. On June 17, 1999, Information Technology informed the Product Manager and Relationship Manager that Information Technology was unable to commit to the September 1st cut-over date because of open issues. A detailed Specification Package was required before resources could be assigned and a formal due date set.
6. On June 21, 1999, the Product Manager submitted the SNET Sub-Entity Billing Specifications Package to the Relationship Manager and that document was then forwarded to Information Technology for review on June 25, 1999. After review of that document, Information Technology agreed to an October 1, 1999 cut-over date.

7. SNET has worked through this billing project in an orderly fashion to achieve accuracy and can reasonably expect that the billing product will function as intended if the original schedule is completed as planned. Any requirement to expedite the project to allow completion by September 6, 1999 would jeopardize the quality of the resulting billing product.

AFFIANT'S SIGNATURE

Paul F. Wether

STREET ADDRESS

545 Long Wharf Drive

CITY, STATE, AND ZIP CODE

New Haven, CT. 06510

SUBSCRIBED AND SWORN TO BEFORE ME ON THIS 23RD DAY

OF JULY, 1999.

Eila F. Schmidt

Notary Public, in and for the State of Connecticut.

EILA F. SCHMIDT, NOTARY PUBLIC
MY COMMISSION EXPIRES AUG. 31, 2003

Bill Date:
Account Number:
Telephone Number:

May 13, 1999

R



Previous Charges	Payments	Adjustments	Balance	Current Charges	Total Due
\$86.32	\$86.32cr	\$0.00	\$0.00	\$78.26	\$78.26

Account Summary

Previous Charges	86.32
Payment Received - Thank You!	86.32cr
Outstanding Balance before Current Charges	0.00
Current Charges	78.26
Monthly Charges	18.84
Discounts	11.65cr
SNET Calling Charges (before discounts)	26.16
Taxes and Surcharges	3.14
SNET Wireless (All Charges, Discounts and Taxes)	39.27
Other Long Distance Companies	2.50
Total Due	78.26

To avoid 1% late charge, please pay \$78.26 by June 12
Basic Charges \$32.22
(see reverse for definition)

Questions?

Here are the toll-free numbers to call

SNET -

Paying, Billing, Adding, or Changing Service:

811 or 1-800-453-SNET if calling from out of state

Repair Service:

Business: 1-203-420-3131

Residential: 611

SNET Wireless Services -

Billing, Sales, Service, Lost or Stolen Phones:

Wireless Service: 1-800-922-5469

Paging Service: 1-800-626-2636

Non-SNET portions of your bill -

See the top of each company's page

Your Savings This Month

You saved \$28.93

this month by using your
SNET All Distance Services

Thank You For Using SNET!

Page 1

Please detach here and return with your payment. Write account number on check and make payable to SNET



00041900 2 AV 0.463 15

11100001100010011010000101000111010000101110000011001100100101

Bill Date: May 13, 1999
Account Number:
Please Pay By: June 12, 1999
Total Amount Due: \$78.26

Amount
Enclosed:

SNET
PO BOX 1861
NEW HAVEN CT 06508-0901

Customer Information Section

Your Service Plan SNET is your carrier for instate, interstate, and international calls.
Your Savings You saved \$28.93 this month by using your SNET All Distance Services!

The new phones are here! Stop into an SNET Store or call your business office (811) for more info.

Explanation of Terms and Services

Basic and Non-Basic Charges:

The total amount due on your telephone bill may consist of Basic and Non-Basic Charges. You are responsible for the payment of all charges on your bill. Failure to pay Basic Charges may result in disconnection of your telephone service for non-payment. Telephone service will not be disconnected for non-payment if you do not pay the Non-Basic portion of your bill. However, failure to pay any portion of your bill may result in collection action.

Monthly Charges (basic):

- **Regulated Network Services** include telephone service to the customer premises and other services such as Totalphone® and Smartlink®.
- **FCC Line Charge** is required by the Federal Communications Commission and covers a portion of the cost to connect the customer to the long distance network.
- **Network and Data Transmission** include Special Services (circuits), the regulated portion of Packet Switched Data Networks and Centralink® Centrex Services.

(non-basic):

- **Advertising** in the yellow and/or white page directories, electronic or other media.
- **ConnNet® and Packet Switched Data Networks** (non-regulated portion).
- **Terminal Equipment** includes all leased or rented devices such as telephones and data sets.
- **Inside Wire** contracts to maintain and repair wiring inside the customer premises without additional charge at the time of repair.
- **SNET Internet (SM)** access and usage charges.

Calling Charges (basic):

- Local and long distance calls, local and long distance calling plans, WATS/800 service and calls to Directory Assistance (411) for obtaining telephone listings.

(non-basic):

- 900 calls and calls placed through alternate operator service providers.

Cellular (non-basic):

- All charges for cellular products and services.

Other Charges and Credits (basic and non-basic):

- One-time charges for installations, moves and changes; one-time adjustments for items that carry a monthly rate based on the number of days from installation or removal to regular billing date. These charges may be basic or non-basic depending on the associated product or service or the payment option selected.

Taxes (basic and non-basic):

- Most charges are subject to federal and state sales tax. Disabled services are not taxed.

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Call 1-800-890-SNET

AFFIDAVIT OF Dan Roper

State of Missouri

County of St. Louis

BEFORE ME, the undersigned authority, on this day personally appeared Dan Roper-Director-Enhanced CRIS who, after having been by me duly sworn, on oath deposes and says that:

1. My name is Dan Roper and I have been an employee of Southwestern Bell Telephone Company (SWBT) for the past 22 years. My title is Director-Enhanced CRIS and I have responsibility for changes to the Southwestern Bell Telephone Company billing system. I am over the age of eighteen and am not otherwise prohibited by law from making this affidavit. All matters recited herein are true and correct to the best of my knowledge.

2. I have examined the requirements for compliance with the Truth-in-Billing requirement that SWBT distinguish "deniable" from "non-deniable" charges on its bills and have determined that the very earliest that SWBT could meet that requirement is March of 2,000, if the project is expedited and proceeds according to schedule.

3. In order to distinguish between deniable/non-deniable charges on a customer's bill, most of our mainline billing programs and multiple customer information databases will be impacted. Virtually every dollar billed to a customer must be classified, bucketed and displayed properly so that it is clear to the customer what charges are required to be paid in order to avoid disconnection of their local service. This is complicated by the fact that certain services as billed today, such as "monthly service" may include both types of charges.

4. A typical timeline for a major billing project, such as this one, spans about a 9 to 12 month period of time from inception to implementation. For a project of this magnitude, a March of 2000 implementation date is very aggressive, but SWBT has committed to try to reach that goal in order to comply with the Order as quickly as possible.

5. The critical steps necessary to the successful implementation of this project are as follows:

- Documentation of the requirements of the project. This includes a determination of what needs to be done and how to do it, as well as a determination of how the designation is to appear on the bill.
- Identification of all impacted programs and analysis of the changes required by each program
- System design to coordinate all of the impacted programs
- Actual programming work to code necessary changes

- Thorough testing of all changes in simulated environments and in parallel to the live environment
6. A high level estimate has been developed to determine the scope and time required to complete this project. More than 1,000 workdays are estimated by all disciplines. Some of this time would be groups working simultaneously to address their individual areas. Teams are already in the process of determining the billing changes that will be required for this project and we remain focused on and committed to reaching a March, 2000 implementation date, if at all possible.
7. In order to properly program and thoroughly test these changes, the time period proposed is the absolute minimum time required; implementation on a more aggressive timeframe would jeopardize the results.
8. One factor that impacts the timeframes within which this work can be done is the critical nature of the Y2K project. SWBT has dedicated substantial time and resources both in people and in dollars to insure against any disruption in service to our customers as a result of Y2K. We have issued a software freeze during the November 1, 1999 to March 1, 2000 timeframe to minimize the risk to our systems during this critical timeframe. An exception is being made for the deniable/non-deniable project, however, and SWBT will be working to code for this project during that timeframe in order to try to achieve the goal of being ready to implement by the March of 2000 commitment date.

AFFIANT'S SIGNATURE

Dan Roper

One Bell Center, Room 20-Z-1

STREET ADDRESS

St. Louis, Missouri 63101

CITY, STATE, AND ZIPCODE

SUBSCRIBED AND SWORN TO BEFORE ME ON THIS 23rd DAY

OF July, 1999.

Mary Ellen Kalapinski

Notary Public in and for the State of Missouri

MARY ELLEN KALAPINSKI
NOTARY PUBLIC STATE OF MISSOURI
ST. LOUIS CITY
MY COMMISSION EXP. AUG. 19, 2001

AFFIDAVIT OF SHELLEY SKEE

State of California

County of Contra Costa

BEFORE ME, the undersigned authority, on this day personally appeared Shelley Skee who, after having been by me duly sworn, on oath deposes and says that:

1. My name is Shelley Skee and I have been an employee of Pacific Bell for 13 years. I am over the age of eighteen and am not otherwise prohibited by law from making this affidavit. I have responsibility for Project Management of billing system changes for the billing system that serves Pacific Bell, as well as Nevada Bell. All matters recited herein are true and correct to the best of my knowledge.
2. I have examined the high level requirements for compliance with the Truth-in-Billing requirement that Pacific Bell and Nevada Bell distinguish "deniable" from "non-deniable" charges on its bills. Based on the high priority of this request, I will use my best efforts to achieve a March of 2000 implementation.
3. In order to distinguish between deniable/non-deniable charges on a customer's bill, most of our mainline billing programs and multiple customer information databases will be impacted. Virtually every dollar billed to a customer must be classified, bucketed and displayed properly so that it is clear to the customer what charges are required to be paid in order to avoid disconnection of their local service. This is complicated by the fact that certain services as billed today, such as "monthly service" may include both types of charges.
4. A typical timeline for a major billing project, such as this one, spans about a 9 to 12 month period of time from inception to implementation. For a project of this magnitude, a March of 2000 implementation date is very aggressive.
5. The critical steps necessary to the successful implementation of this project are as follows:
 - Documentation of the requirements of the project. This includes a determination of what needs to be done and how to do it, as well as a determination of how the designation is to appear on the bill.
 - Identification of all impacted programs and analysis of the changes required by each program
 - System design to coordinate all of the impacted programs
 - Actual programming work to code necessary changes
 - Thorough testing and validation of all changes in simulated environments and in parallel to the live environment

6. An order of magnitude has been developed to determine the scope and time required to complete this project. More than 1,000 workdays are estimated by all disciplines. Some of this time would be groups working simultaneously to address their individual areas. Teams are already in the process of determining the billing changes that will be required for this project and we remain focused on targeting a March of 2000 implementation date, if at all possible.

7. In order to properly program and thoroughly test these changes, the time period proposed is the absolute minimum time required; implementation on a more aggressive timeframe would jeopardize the results.

8. One factor that impacts the timeframes within which this work can be done is the critical nature of the Y2K project. Pacific Bell/Nevada Bell have dedicated substantial time and resources, both in people and in dollars, to insure against any disruption in service to our customers as a result of Y2K. We have issued a software freeze during the November 1, 1999 to March of 2000 timeframe to minimize the risk to our systems during this critical timeframe.

AFFIANT'S SIGNATURE



2600 Camino Ramon, Room 4W700II

STREET ADDRESS

San Ramon, CA, 94583

CITY, STATE, AND ZIPCODE

SUBSCRIBED AND SWORN TO BEFORE ME ON THIS 23rd DAY

OF Jul, 1999.



Notary Public, in and for the State of California
Contra Costa



INTERNATIONAL TRANSCRIPTION SERVICE INC
1231 20TH STREET NW
WASHINGTON DC 20037

ALABAMA PUBLIC SERVICE
COMMISSION
P O BOX 304260
MONTGOMERY AL 36130 4260

GRETCHEN THERESE DUMAS
CALIFORNIA PUBLIC UTILITIES COMMISSION
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SAN FRANCISCO CA 94102

FEDERAL COMMUNICATIONS COMMISSION
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TW A325
WASHINGTON DC 20554

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INDEPENDENT TEL & TELECOMMUNICATIONS
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MADISON WI 53707 7854

PUBLIC UTILITY COMMISSION OF TEXAS
1701 N CONGRESS AVENUE
P O BOX 13326
AUSTIN TX 78711 3326

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WEST TOWER
WASHINGTON DC 20005

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COMPETITIVE TELECOMMUNICATIONS ASSOC
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RURAL TELECOMMUNICATIONS GROUP
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RUSSELL M BLAU
COMMONWEALTH TELEPHONE COMPANY
3000 K STREET NW
SUITE 300
WASHINGTON DC 20007 5116

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